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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

RENEE ARROYO,
Plaintiff,

v.

GEICO INSURANCE AGENCY, INC.
d/b/a GEICO, a Foreign Corporation;
DOES 1-10; and ROE Entities 11 through
20, inclusive jointly and severally,

Defendants.

Case No. 2:21-cv-00343-RFB-BNW

STIPULATION AND ORDER TO
EXTEND RESPONSE DEADLINE
DATES AND TO MOVE HEARING ON
DEFENDANT'S MOTIONS
(FIRST REQUEST)

Pursuant to LR IA 6-1, Plaintiff, RENEE ARROYO, by and through her counsel of record, AMANDA L. LAUB, ESQ.; and Defendant, GEICO INSURANCE AGENCY, INC. d/b/a GEICO, by and through its counsel of record, JONATHAN CALRSON, ESQ, hereby submit the following *Stipulation and Order to Extend Response Deadline Dates and to Move Hearing on Defendant's Motions (First Request)*. The parties respectfully request an extension of 14 days from the dates currently set forth in by the court for Response to Defendant's Motion to Dismiss and Motion to Stay that were filed on March 8, 2021. This is the first stipulation for extension of time to file the Response.

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1 **I. DISCUSSION**

2 On March 8, 2021 Plaintiff was served with Defendant's two Motions, a Motion for
3 Dismissal and Motion for Stay. Both Motions weigh heavily as to Plaintiff's case and ability to
4 continue to pursue her claims. Defendant's Motion to Dismiss came with an instruction that
5 Responses were due by March 22, 2021. Due to the weight of the Defendant's Motions and
6 despite Plaintiff's due diligence in research and preparing her Response, Plaintiff requires
7 additional time to complete her Response. Defendant has kindly agreed to allow Plaintiff an
8 additional 14 days to file her response. The new date Plaintiff's Response shall be due is April 5,
9 2021. Following LR 7-2(b), Defendant's Reply shall be due on April 19, 2021. Plaintiff asserts
10 this stipulation is made in good faith and not for the purposes of undue delay. This is the first
11 request for extension.

12 **VI. CONCLUSION**

13 Based on the above, requisite good cause exists to warrant an extension of the current
14 response deadline so that all parties may adequately argue their motion and opposition on its
15 merit.

16 Dated this 23rd day of March, 2021.

17 Dated this ____ day of March, 2021.

18 **RUIZ LAW FIRM**

19 **McCORMICK BARSTOW LLP**

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21 
22 _____
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28 */s/ Jonathan W. Carlson*
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Attorney for Defendant

Arroyo v. GEICO
Case No. 2:21-cv-00343-RFB-BNW

ORDER

IT IS SO ORDERED that the above Response Deadlines be extended as agreed to by the parties herein in accordance with this Stipulation and Order.

DATED this 24th day of March, 2021.


RICHARD E. BOULWARE, II
United States District Court

Submitted by:

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